

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

JENNIFER KASILAG, *et al.*,

Plaintiffs,

v.

HARTFORD INVESTMENT FINANCIAL
SERVICES, LLC,

Defendant.

Civil No. 1:11-cv-01083-RMB-KMW

JENNIFER KASILAG, *et al.*,

Plaintiffs,

v.

HARTFORD FUNDS MANAGEMENT
COMPANY, LLC,

Defendant.

Civil No. 1:14-cv-01611-RMB-KMW

**JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING
DEADLINES RELATED TO WELLINGTON'S MOTION
TO INTERVENE AND SEAL DOCUMENTS**

WHEREAS, on June 15, 2015, Wellington Management Group LLP and Wellington Management Company LLP ("Wellington") filed a Motion to (1) Intervene; and (2) Seal Confidential Non-Public Financial Information (collectively the "Motion");

WHEREAS, Wellington's Motion is returnable on July 20, 2015 with Plaintiffs' Opposition currently due on July 6, 2015 and Wellington's Reply due on July 13, 2015;

WHEREAS, Plaintiffs seek a brief one week extension to file their opposition due to other work they are performing in connection with this case, which includes the following:

- a. Drafting and filing, on July 6, 2015, a Brief in Opposition to Defendant Hartford Investment Financial Services, LLC's ("HIFSCO's") Motion to Seal approximately 40 documents, which will be heard by the Honorable Renee Marie Bumb;
- b. Responding to HIFSCO's Motion for Summary Judgment, which includes over 100 exhibits (Opposition Briefs are due on July 22nd) and;
- c. Taking, and defending, depositions of expert witnesses, of which there are eight in total between the two parties (all expert depositions will be completed by July 2nd, with the exception of one expert).

WHEREAS, with respect to Wellington's Motion, subject to approval of the Court, Plaintiffs have proposed a one-week extension of the Opposition and Reply deadlines; and

WHEREAS, subject to approval of the Court, Wellington has consented to the proposed one-week extension of the above deadlines;

NOW, THEREFORE, the parties hereby STIPULATE AND AGREE, by and through their undersigned counsel and subject to the Court's approval, as follows:

1. Plaintiffs shall have until July 13, 2015 to file their Opposition to Wellington's Motion.
2. Wellington shall have until July 20, 2015 to file their Reply to Plaintiffs' Opposition.

Dated: June, 29, 2015

Respectfully submitted,

By: /s/ Robert L. Lakind

Robert L. Lakind

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Attorneys for Plaintiffs

*Attorneys for Wellington Management Group
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SO ORDERED.

June 30, 2015



Hon. Karen M. Williams

United States Magistrate Judge